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10 Attorneys for Defendants
11 UNUM GROUP, UNUM LIFE INSURANCE
12 COMPANY OF AMERICA, FIRST UNUM
13 LIFE INSURANCE COMPANY OF AMERICA, and THE
14 PAUL REVERE LIFE INSURANCE COMPANY

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 ALEXANDER P. SOMMER, an individual, by
18 and through his Guardian ad Litem,
19 CHRISTIAN SOMMER,

20 Plaintiff,

21 vs.

22 UNUM, UNUMPROVIDENT
23 CORPORATION; UNUM PROVIDENT LIFE
24 INSURANCE COMPANY OF AMERICA;
25 FIRST UNUM LIFE INSURANCE
26 COMPANY OF AMERICA; PAUL REVERE
27 LIFE INSURANCE COMPANY,

28 Defendants

Case No.: C07-2846 SC

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
COMPLETE EARLY NEUTRAL
EVALUATION**

1 Pursuant to ADR Rule 5-5, defendants UNUM Group, Unum Life Insurance Company of
2 America, First Unum Life Insurance Company of America, and The Paul Revere Life Insurance
3 Company ("defendants") and plaintiff Alexander P. Sommer, by and through their respective
4 counsel, hereby stipulate that the time to complete Early Neutral Evaluation ("ENE") in this
5 matter be extended for good cause shown.

6 WHEREAS, on August 27, 2007, the district court ordered this matter to ENE (pursuant
7 to the parties' ADR stipulation), to be completed within 90 days thereafter;

8 WHEREAS, on September 21, 2007, at a Case Management Conference, the court set a
9 specific briefing schedule for defendants' motion to dismiss;

10 WHEREAS, the parties have submitted their respective papers regarding the motion to
11 dismiss, and the motion is now under submission;

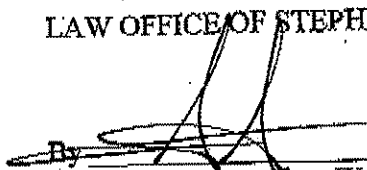
12 WHEREAS, the appointed ENE evaluator is attempting to schedule the ENE pre-
13 conference and conference dates pursuant to the November 25, 2007 ENE completion deadline;

14 Good cause exists to extend the ENE deadline so that the motion to dismiss may be
15 decided before any party is forced to incur any further legal fees and costs, and to obviate any
16 unnecessary work-up by the appointed ENE evaluator, Stephen McKae, Esq.

17 IT IS SO STIPULATED.

18 LAW OFFICE OF STEPHEN W. STEELEMAN

19
20
21 Dated: October 23, 2007

22 By 
23 Stephen W. Steelman
24 Attorneys for Plaintiff
25 ALEXANDER P. SOMMER
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27
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-1-
STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO COMPLETE ENE

CASE NO. C07-2846 SC

KELLY, HERLIHY & KLEIN LLP

Dated: October 23, 2007

By



John T. Burnite

Attorneys for Defendants

UNUM GROUP, UNUM LIFE INSURANCE
COMPANY OF AMERICA, FIRST UNUM LIFE
INSURANCE COMPANY OF AMERICA, and
THE PAUL REVERE LIFE INSURANCE COMPANY

ORDER

Good cause having been shown, it is hereby ordered that the deadline for the parties to
complete the ENE in this matter is extended to _____.

IT IS SO ORDERED.

DATED: October __, 2007

SAMUEL CONTI

UNITED STATES DISTRICT JUDGE

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